



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

URGENT MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

February 26, 2016

Mr. Gregory Maguire
Revision Military, Ltd.
7 Corporate Drive
Essex Junction, VT 05452

RE: **NOTICE OF VIOLATION** of the Resource Conservation and Recovery Act (RCRA), the Hazardous and Solid Waste Amendments of 1984 (HSWA) and State of Vermont Hazardous Waste Management Regulations, 10 V.S.A. Chapter 159, Section 7-101 through 7-916.

Dear Mr. Maguire:

On June 11-12, 2014, representatives of the United States Environmental Protection Agency ("EPA") conducted a RCRA Compliance Evaluation Inspection. The purpose of this inspection was to determine the compliance of Revision Military, Ltd., EPA ID No. VTD000518779, with VHWMR 7-101 through 7-916 and the federal Hazardous Waste Management Regulations found at 40 CFR Parts 260-272. The State of Vermont has been granted final authorization by EPA to administer certain portions of RCRA.

As a result of the inspection noted above, EPA has determined that your facility violated certain provisions of VHWMR 7-101 through 7-916 and the RCRA regulations, promulgated at 40 CFR Parts 260 through 272. The violations are set forth below:

1. Failure to keep training records on current personnel until closure of the facility, and, keeping training records on former employees for at least three years from the date the employee last worked at the facility;
2. Failure to provide aisle space between rows of containers sufficient to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment and decontamination equipment in any area of facility operation and, in no circumstance, shall the aisle space be less than twenty-four inches wide;
3. Failure to clearly mark containers and packages used for the storage of hazardous wastes from the time they are first used to accumulate or store waste;
4. Failure to retain a signed copy of the manifests for at least 3 years from the date of the original shipment or until receipt of a completed copy;

5. Failure to close containers of universal waste lamps and seal full containers of universal waste lamps with tape; and,
6. Failure to label a container in which waste PCB ballasts are contained, or mark each used PCB ballast, with one of the required phrases.

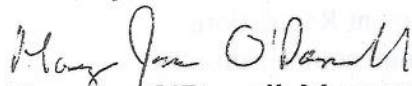
Revision Military, Ltd. must address the requirements set forth above and must immediately begin and continue to operate in compliance with all applicable Federal and State regulations.

Within (30) thirty calendar days of receipt of this NOTICE, submit a written description, with supporting documentation, of the actions taken to address requirements 1 through 6 above. Submit the information to:

Donald MacLeod, Environmental Engineer
U.S. Environmental Protection Agency
Office of Environmental Stewardship (OES05-4)
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Failure to correct the violations as required by this NOTICE may subject the facility to further Federal enforcement action, including the assessment of penalties, pursuant to Section 3008 of RCRA, 42 U.S.C. § 6928. If you have any questions regarding this NOTICE, please contact Donald MacLeod, of my staff, at 617-918-1405.

Sincerely,



Mary Jane O'Donnell, Manager
Office of Environmental Stewardship

cc: Steve Simoes, VTDEC
File